

Chief, Regulations and Procedures Division  
Alcohol and Tobacco Tax and Trade Bureau  
Att'n: Notice No. 49  
P.O. Box 14412  
Washington, DC 20044-4412

Comment 16

As a wine grape grower I am strongly opposed to the proposal to lower the vintage dating requirement to 85% for a selected segment of wines. Such a move would serve not only to lower net prices paid for grapes – by allowing wineries to use a greater share from high production, lower priced years – but would also lower the overall quality of American wines.

In addition to the negative effects it would have on me and other growers, American consumers will recognize this as a lowering of wine quality standards, and those who are not already confused by conflicting labeling requirements (e.g. varietal content of 85% for AVA designated wines and 75% for geographical designations) will now have to contend with a 95% vintage dating requirement for AVA designated wines and 85% for geographical designations. This would be a disservice to consumers as well as to growers.

This proposed change in regulations would be of financial benefit to only a few large wineries and is inconsistent with the Alcohol and Tobacco Tax and Trade Bureau statement of mission, which includes the statement, *"Our objectives are to protect the (tax) revenue, protect the consumer and promote voluntary compliance."*

I therefore urge you to withdraw this proposed change to wine labeling regulations.

Sincerely,

Robert E. Gloeckner

4800 Hessel Rd.

Sebastopol, Ca. 95472

(707) 795-6729

Owner: Westphall Ridge Vineyards

& Gloeckner-Turner Vineyards

"Sonoma County" Ca.